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Attorneys for General Motors LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)
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**NOTICE OF FILING OF ELEVENTH SUPPLEMENT TO
SCHEDULE "2" TO THE MOTION OF GENERAL MOTORS LLC
PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE THE
COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION**

PLEASE TAKE NOTICE that on November 5, 2014, General Motors LLC filed the attached *Eleventh Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction* with the United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York
November 5, 2014

Respectfully submitted,

/s/ Scott I. Davidson

Arthur Steinberg

Scott Davidson

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ELEVENTH SUPPLEMENT¹ TO SCHEDULE “2”

**SAMPLE ALLEGATIONS/CAUSES OF ACTION IN IGNITION SWITCH
COMPLAINTS FILED AGAINST NEW GM NOT CONTAINED IN THE
PREVIOUS SUPPLEMENTS TO SCHEDULE “2” TO MOTION TO ENFORCE**

<u>Action</u>	<u>Allegations</u>
<p><i>In re General Motors LLC Ignition Switch Litigation – Consolidated Class Action Complaint Against New GM For Recalled Vehicles Manufactured By Old GM and Purchased Before July 11, 2009 (“<u>Pre-Sale Complaint</u>”)</i></p>	<p>“With respect to each of the Claims for Relief asserted herein, the Classes thus assert two distinct, severable, and independent bases of New GM liability: (1) GM’s own knowledge, deceptive, negligent, and violative conduct, its breach of its own duty, and resulting harm; and (2) New GM’s successor liability.” Pre-Sale Complaint, ¶ 815.</p> <p>The Pre-Sale Complaint defines the Nationwide Class of Plaintiffs as “[a]ll persons in the United States who entered into a lease or bought, prior to July 11, 2009, and who (i) own or lease, or (ii) who sold after February 14, 2014, or (iii) who had declared a total loss after an accident occurring after February 14, 2014, one or more of the following GM vehicles: 2003-2007 Saturn Ion; 2005-2009 Chevrolet Cobalt; 2007-2009 Pontiac G5; 2006-2009 Chevrolet HHR; 2006-2009 Pontiac Solstice; 2007-2009 Saturn Sky; 2004-2005 Buick Regal LS & GS; 2005-2009 Buick Lacrosse; 2006-2009 Buick Lucerne; 2000-2005 Cadillac Deville; 2004-2009 Cadillac DTS; 2006-2009 Chevrolet Impala; 2000-2008 Chevrolet Monte Carlo; 2003-2009 Cadillac CTS; 2004-2006 Cadillac SRX; 1997-2005 Chevrolet Malibu; 2000-2005 Pontiac Grand Am; 2004-2008 Pontiac Grand Prix; 1998-2002 Oldsmobile Intrigue; 1999-2004 Oldsmobile Alero; or 2008-2009 Pontiac G8 (‘Defective Vehicles’).” Pre-Sale Complaint, ¶ 828.</p> <p>The definition for the State Classes are substantially similar to the definition of the Nationwide Class. Pre-Sale Complaint, ¶ 829.</p> <p>Pursuant to the above-referenced definitions (and other allegations contained in the Pre-Sale Complaint too numerous to set forth herein), the Pre-Sale Complaint concerns only vehicles manufactured and sold by Old GM. Moreover, for the reasons discussed in the <i>Opening Brief by General Motors LLC on Threshold Issues Concerning Its Motions to Enforce the Sale Order and Injunction</i> (“<u>New GM Opening Brief</u>”), which is being filed on the same day as this Supplemental Schedule, all of the claims asserted in the Pre-Sale Complaint violate the Sale Order and Injunction, and are barred.</p>

¹ This schedule supplements the previous supplements and the original Schedule “2” previously filed with the Court in connection with the *Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction*.

<p><i>In re General Motors LLC Ignition Switch Litigation – Consolidated Complaint Concerning All GM-Branded Vehicles That were Acquired July 11, 2009 or Later (“<u>Post-Sale Complaint</u>”)</i></p>	<p>Of the 68 Named Plaintiffs in the Post-Sale Complaint, (i) 44 (approximately 65%) own vehicles that are Model Year 2009 or earlier (and thus were manufactured by Old GM); (ii) 13 own vehicles that are Model Year 2010 (some or all of which may have been manufactured by Old GM); (iii) 2 do not provide information on the Model Year of the vehicle identified; and (iv) 9 (approximately 13%) own vehicles that are Model Year 2011 or later. <i>See</i> Post-Sale Complaint, ¶¶ 27-93.</p> <p>Numerous allegations contained in the Post-Sale Complaint regarding the alleged ignition switch defect concern Old GM’s conduct. <i>See</i> Post-Sale Complaint, ¶¶ 192-253.</p> <p>The Post-Sale Complaint defines the Nationwide Class of Plaintiffs as “[a]ll persons in the United States who purchased or leased a GM-branded vehicle between July 11, 2009 and July 3, 2014 (the ‘Affected Vehicles’) and who (i) still own or lease an Affected Vehicle, (ii) sold an Affected Vehicle on or after February 14, 2014, and/or (iii) purchased or leased an Affected Vehicle that was declared a total loss after an accident on or after February 14, 2014.” Post-Sale Complaint, ¶ 846.</p> <p>The definition for the Statewide Classes are substantially similar to the definition of the Nationwide Class. Post-Sale Complaint, ¶ 852.</p> <p>Pursuant to the above-referenced definitions (and other allegations contained in the Post-Sale Complaint too numerous to set forth herein), the Post-Sale Complaint concerns vehicles manufactured and sold by Old GM. Moreover, for the reasons discussed in the New GM Opening Brief, claims asserted in the Post-Sale Complaint violate the Sale Order and Injunction, and are barred.</p>
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